



October 14, 2011

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 10-90; GN Docket No. 09-51; WC Docket
No. 07-135; WC Docket No. 05-337; CC Docket No. 01-92;
CC Docket No. 96-45; WC Docket No. 04-36

Dear Ms. Dortch:

On October 13, 2011, Chris Miller and Kathy Grillo of Verizon, Melissa Newman and Jeff Lanning of CenturyLink, Mike Rhoda, Eric Einhorn, and Jennie Chandra of Windstream, Hank Hultquist and Joel Lubin of AT&T, Ken Mason and Michael Saperstein of Frontier, and the undersigned met with Rebekah Goodheart, Michael Steffen, Victoria Goldberg, and Marcus Maher of the Commission.

The purpose of the meeting was to discuss Chairman Genachowski's draft universal service and intercarrier compensation reform order now circulating with FCC commissioners. In particular, we discussed the intercarrier compensation proposals in the draft order and elements of the America's Broadband Connectivity Plan ("ABC Plan") that may be reflected in the draft order. We discussed reductions in intercarrier compensation revenues for some carriers as a result of reductions in terminating access rates, the potential end-state of intercarrier compensation reform, and the transition schedule for carriers.

We also discussed the approach in the draft order to allowable pricing flexibility through an "access recovery charge" that may become part of existing subscriber line charges. In addition, we discussed the approach in the draft order to revenue recovery through a temporary access revenue replacement mechanism within the Universal Service Fund. Finally, we discussed how the draft order addresses VoIP traffic and the legal analysis with respect to VoIP compensation.

Pursuant to Commission rules, please include a copy of this filing in each of the above-referenced dockets.

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Should you have any questions, please contact me.

Sincerely,

A handwritten signature in blue ink that reads "Jonathan Banks". The signature is fluid and cursive, with the first name "Jonathan" and the last name "Banks" clearly legible.

Jonathan Banks

c: Rebekah Goodheart
Michael Steffen
Victoria Goldberg
Marcus Maher